

1. On August 3, 2015, the Commission filed its Complaint alleging that Defendants violated various provisions of the federal securities laws. Relief Defendant was named in this action for collections purposes and was not charged with violating the law.

2. The Commission and Relief Defendant have reached a partial settlement regarding the Commission's claims. Without admitting or denying the allegations in the Commission's Complaint, Relief Defendant has consented to the entry of a partial judgment which, among other things: (a) provides that Relief Defendant shall disgorge all money flowing to Relief Defendant from the conduct described in the Complaint, in amounts to be determined by the Court upon motion of the Commission. The only issue remaining as to Relief Defendant in the litigation is the determination by the Court upon motion of the Commission of the appropriate amount of monetary relief.

3. Relief Defendant has executed a Consent (attached as Exhibit A) and a proposed Agreed Partial Judgment (filed concurrently with this motion).

4. The parties move the Court to enter the proposed Agreed Partial Judgment.

5. Counsel for the Commission has conferred with counsel for the Relief Defendant and represents that Relief Defendant is agreed to this motion.

Dated: December 1, 2015

Respectfully submitted,

s/Jennifer D. Brandt

Jennifer D. Brandt

Attorney-in-Charge

S.D. Tex. Bar No. 37943

Texas Bar No. 00796242

United States Securities and Exchange Commission

Fort Worth Regional Office

801 Cherry Street, 18th Floor

Fort Worth, TX 76102-6882

Phone: (817) 978-6442

Fax: (817) 978-4927

brandtj@sec.gov

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I affirm that on December 1, 2015, I electronically filed the foregoing document with the Clerk of the Court for the Southern District of Texas, Houston Division, and have served all parties in accordance with Fed.R.Civ.P.5(b)(2).

/s/ Jennifer D. Brandt

Jennifer D. Brandt